

Julley

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December 19, 1994

Reply To
Attn Of: HW-124

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DEC 28 1994

Ms. Lisa Green
Environmental Restoration Division
Department of Energy
Idaho Field Office
785 DOE Place
Idaho Falls, Idaho 83401-1562

Program Management

Re: INEL Track 2 Summary Report for Operable Unit 3-09

Dear Ms. Green:

In a submittal received November 23, 1994 you provided the Environmental Protection Agency (EPA) a revised Track 2 Summary Report for OU 3-09. On the basis of our evaluation of the information presented in the Report, we recommend that all fifteen OU 3-09 sites be included in the "WAG 3 Comprehensive RI/FS."

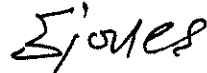
DOE has recommended that thirteen of the fifteen sites in this operable unit be forwarded to the comprehensive RI/FS. The remaining two sites, CPP-22 and CPP-78, have been recommended for "No Further Action." Although CPP-22 is recommended for no action, however, it has been proposed for inclusion into the new unit, CPP-88 (radiologically contaminated soils), which will be investigated as part of the RI.

We agree with DOE's recommendation that CPP-22 should be included into the CPP-88 investigation. So that there is no misunderstanding about the remedial status of the site, however, we feel it is premature to recommend "No Further Action."

We do not agree with DOE's recommendation for CPP-78. As we noted in our comments on the draft Summary Report, the uncertainty surrounding the source term at this site requires additional supporting information before a determination can be made about remedial action. This additional information should be discussed during RI scoping, and the WAG managers should form a consensus on a cost-effective method of reducing the uncertainty to a level where decision-making can proceed.

If you have any questions, please contact me at (206) 553-1743.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ed Jones".

Ed Jones, Acting WAG 3 Manager
Federal Facility Section I

cc: D. Nygard, IDHW
S. Reno, IDHW
T. Jenkins, DOE